



**FILED**

07/19/18  
11:52 AM

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop a  
Successor to Existing Net Energy Metering  
Tariffs Pursuant to Public Utilities Code  
Section 2827.1, and to Address Other Issues  
Related to Net Energy Metering.

Rulemaking 14-07-002

**ADMINISTRATIVE LAW JUDGE'S RULING REQUIRING SUPPLEMENTAL  
INFORMATION REGARDING PETITION OF CALIFORNIA SOLAR AND  
STORAGE ASSOCIATION TO MODIFY DECISION 14-05-033**

On September 1, 2017, the California Solar & Storage Association (CALSSA) filed a petition to modify Decision (D.) 14-05-033 to allow direct current (DC)-coupled solar plus storage systems (Petition).<sup>1</sup>

The Petition identifies three options for ensuring DC-coupled solar plus storage systems operate in such a way that only net energy metering-eligible generation receives net energy metering bill credits. Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company (Joint Utilities) state the second option, a software configuration, “may have promise” from their perspective but they raise specific concerns such as who/what entity would have access to the password and whether alteration of the software would nullify third party certification. CALSSA’s

---

<sup>1</sup> *Petition of the California Solar Energy Industries Association for Modification of D.14-05-033 to Allow DC-Coupled Solar Plus Storage Systems*, filed September 1, 2017. On February 8, 2018, the California Solar & Storage Association filed a notice of name change from California Solar Energy Industries Association to California Solar & Storage Association, or CALSSA.

reply does not specifically address those concerns but states “the Commission needs to work out some details.”<sup>2</sup>

This ruling solicits responses from CALSSA and invites responses from any other parties to the following questions regarding CALSSA’s proposed software approach before the Commission determines whether to consider this option.

1. What are the primary advantages of using software rather than firmware settings to limit grid charging?
2. What are the primary disadvantages of using software rather than firmware settings to limit grid charging?
3. Describe any safety risks associated with using software rather than firmware settings to limit grid charging. Alternatively, explain in detail how using software settings to limit grid charging do not pose a safety risk.
4. To what extent do utilities currently rely on software rather than firmware settings to ensure devices perform according to contractual obligations?
5. Which entity or entities should be responsible for programming device software settings to prevent grid charging, and what steps should be taken to ensure programming is done correctly?
6. What steps should be taken to ensure software settings that prevent grid charging are not removed or modified after initial programming?
7. Which entity or entities should have access to the password protecting the software settings, and how should the process for maintaining passwords be managed?
8. Should third-party certification be required to ensure inverter software settings prevent grid charging? Explain why or why not.
9. If third-party certification is required, which entity should perform the certification? Should the certification need to be re-performed following any re-programming of the inverter?

---

<sup>2</sup> *California Solar Energy Industries Association Reply to Responses to Petition for Modification of D.14-05-033*, filed October 20, 2017, at 2.

10. CALSSA's petition includes a test plan to certify device software settings (Appendix B). Is this test sufficient to ensure device software settings prevent grid charging? Why or why not?

CALSSA must, and other parties may, submit responses to the above questions in a document titled "Response to Ruling Regarding Software Option for Allowing DC-Coupled Solar Plus Storage Systems," no later than ten days after the issue date of this ruling.

**IT IS SO RULED.**

Dated July 19, 2018 at San Francisco, California.

/s/ VALERIE U. KAO

---

Valerie U. Kao  
Administrative Law Judge